

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

ORIGINAL

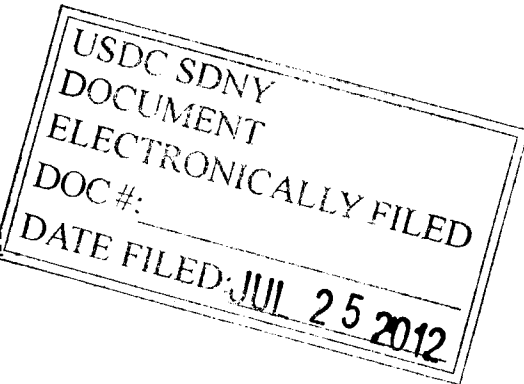
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UNITED STATES OF AMERICA, :

- v. - :

XING LIN, :  
a/k/a "Ding Pa," and :  
HAO CHAO, :  
a/k/a "Little Beijing," :  
Defendants. :

**SUPERSEDING INDICTMENT**

S1 11 Cr. 114 (MGC)



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COUNT ONE  
(Murder)

The Grand Jury charges:

1. On or about July 30, 2004, in the Southern District of New York and elsewhere, XING LIN, a/k/a "Ding Pa," and HAO CHAO, a/k/a "Little Beijing," the defendants, willfully and knowingly, during and in relation to crimes of violence for which they may be prosecuted in a court of the United States, namely, extortion and conspiracy to commit extortion, in violation of Title 18, United States Code, Section 1951, did use and carry a firearm, and, in furtherance of such crimes, did possess a firearm, and did aid and abet the use, carrying, and possession of a firearm, and in the course of that crime did cause the death of a person through the use of the firearm, which killing is murder as defined in Title 18, United States Code, Section 1111(a), to wit, LIN directed CHAO to shoot Chang Qin Zhou inside a club in Queens, New York, and CHAO did shoot Zhou

as well as two bystanders, Mei Ying Li and "Victim-3," killing Zhou and Li, and wounding "Victim-3."

(Title 18, United States Code, Sections 924(j)(1) and 2.)

COUNT TWO

(Extortion and Attempted Extortion)

The Grand Jury further charges:

2. From in or about March 2002, up to and including in or about December 2009, in the Southern District of New York and elsewhere, XING LIN, a/k/a "Ding Pa," and HAO CHAO, a/k/a "Little Beijing," the defendants, and others known and unknown, willfully and knowingly did commit and attempt to commit extortion, as that term is defined in Title 18, United States Code, Section 1951(b)(2), by obtaining money and property from and with the consent of another person, to wit, the owners of a bus company, which consent would have been and was induced by the wrongful use of actual and threatened force, violence, and fear, and thereby would and did obstruct, delay, and affect commerce and the movement of articles and commodities in commerce, as that term is defined in Title 18, United States Code, Section 1951(b)(3), to wit, LIN and CHAO extorted and attempted to extort the owners of a bus company for money.

(Title 18, United States Code, Sections 1951 and 2.)

COUNT THREE  
(Extortion Conspiracy)

The Grand Jury further charges:

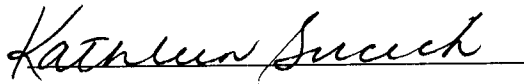
3. From in or about March 2002, up to and including in or about December 2009, in the Southern District of New York and elsewhere, XING LIN, a/k/a "Ding Pa," and HAO CHAO, a/k/a "Little Beijing," the defendants, and others known and unknown, willfully and knowingly did combine, conspire, confederate, and agree together and with each other to commit extortion, as that term is defined in Title 18, United States Code, Section 1951(b)(2), by obtaining money and property from and with the consent of another person, to wit, the owners of a bus company, which consent would have been and was induced by the wrongful use of actual and threatened force, violence, and fear, and thereby would and did obstruct, delay, and affect commerce and the movement of articles and commodities in commerce, as that term is defined in Title 18, United States Code, Section 1951(b)(3).

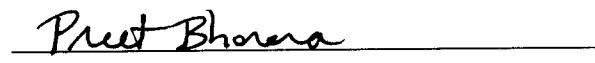
Overt Act

4. In furtherance of the conspiracy, and to effect the illegal object thereof, the following overt act, among others, was committed in the Southern District of New York and elsewhere:

a. In or about 2003, XING LIN, a/k/a "Ding Pa," the defendant, called the part-owner of a bus company ("Victim-4") while Victim-4 was located in New York, New York, and threatened Victim-4 with harm if Victim-4 did not increase the amount of money Victim-4 was paying to LIN.

(Title 18, United States Code, Section 1951.)

  
FOREPERSON

  
PREET BHARARA  
United States Attorney

Form No. USA-33s-274 (Ed. 9-25-58)

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(Title 18, United States Code, Sections  
924(j)(1), 1951, and 2.)

PREET BHARARA

United States Attorney.

A TRUE BILL

Kathleen Sicich

Foreperson.

7/25/12 Filed Superseding Indictment.  
Arrest Warrant issued.

Judge Gorenstein  
U.S.D.